

# **Exhibit C**



Holly Cole <holly@holcombward.com>

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## Notice of Rule 30(b)(6) Deposition of ACLP

1 message

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Daniel Vedra <dan@vedralaw.com>

Thu, Oct 10, 2024 at 5:51 PM

To: Bryan Ward <bryan.ward@holcombward.com>, Holly Cole <holly@holcombward.com>, Aaron Wright <aaron@holcombward.com>, Paul Rachmuth <paul@paresq.com>

All:

Having agreed to a new date and time for the Rule 30(b)(6) Deposition of ACLP, I am providing notice of that deposition. I understand that ACLP believes that the topics are objectionable but has nevertheless agreed to the date and time for the deposition after filing the letter motion for protective order. FOL views this as a waiver of ACLP's motion for protective order, having been agreed to without reservation or objection. At a minimum, I will expect ACLP to be prepared to testify on the bolded topics, since not of them are the subject of the motion for protective order. By taking this deposition now, FOL does not waive its right to continue the deposition to cover the remaining topics if the Court rejects ACLP's request for a protective order.

<https://app.depodirect.com/m/8e7dcff3-802f-4790-ac2e-eb09cdd57abc?sig=59ed213652>

Dan



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**Second Amended Notice of Rule 30(b)(6) Deposition of Alexander Capital.pdf**

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